

Fern, Brian

From: Fern, Brian
Sent: Tuesday, May 23, 2006 3:47 PM
To: ilana.hessing@ace-ina.com
Cc: 'Telgen, William D'
Subject: RE: Delphi: US liability lift-stay motion
Attachments: DRAFT - Lift Stay Procedure Motion.doc; DRAFT - Lift Stay Procedure Order (proposed).doc

Ilana,

Attached please find drafts of the lift stay procedure motion and proposed order. As Bill mentioned, these drafts remain subject to further review and change. Additionally, although the current plan is to file by Friday 5/26, that too is subject to change. We will let you know if there are any material changes to the draft pleadings. Thanks.

Brian

Brian M. Fern
Skadden Arps Slate Meagher & Flom LLP
333 West Wacker Drive, Suite 2100
Chicago, IL 60606
Tel: (312) 407-0815
Fax: (312) 827-9315
brfern@skadden.com